

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff

CIVIL NO.: 19-

v.

**FUNDS IN THE AMOUNT OF
\$53,082,824.19.00 IN U.S. CURRENCY,
CONTAINED IN THE FOLLOWING
ACCOUNTS UNDER THE NAME OF
BANCO SAN JUAN INTERNATIONAL:**

**a) xxx-x7689 – MERRILL LYNCH
ADDRESS: #15 SECOND ST.,
SUITE 210, GUAYNABO, PR
00968, UP TO \$10,000,000.00;**

**b) xxx-x7059 – MERRILL LYNCH
ADDRESS: 225 LIBERTY ST.,
41ST FL, NEW YORK, NY 10281,
UP TO \$5,000,000.00; AND**

**c) FEDERAL RESERVE BANK OF
NEW YORK ACCOUNT # xxxx-
x228-6, UP TO \$38,082,824.19,**

Defendant

**UNITED STATES OF AMERICA’S MOTION TO RESTRICT
OR SEAL UNSWORN DECLARATION**

TO THE HONORABLE COURT:

COMES NOW, the United States of America, by and through its undersigned attorneys, and files this motion to restrict an Unsworn Declaration Under Penalty of Perjury (“Unsworn Declaration”) attached to the United States of America’s Complaint for Forfeiture *in Rem*:

The United States filed a Complaint for Forfeiture *in Rem*. In compliance with the requirements of this Court's Standing Order No. 9, dated January 30, 2013, the United States requests that the Unsworn Declaration be accepted by the Court for filing with the following level of restriction: ***Ex-Parte: Limiting viewing to the attorney filing the document and the Court.***

The United States is filing the referred document with the requested level of restriction, insofar as said Unsworn Declaration reveals information that may adversely affect an ongoing criminal investigation.

WHEREFORE, the United States respectfully prays the Court accept and file the Unsworn Declaration under the requested restriction level, and that an ORDER issue directing that the Unsworn Declaration to remain under such restriction level until further order by the Court.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 27th day of September 2019.

ROSA EMILIA RODRIGUEZ-VELEZ
United States Attorney

s/David O. Martorani-Dale

David O. Martorani-Dale

Assistant U.S. Attorney

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